

# **EXHIBIT C**

Highly Confidential - Marc Edwards, Ph.D.

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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION

-----) Civil Action No.:

IN RE: FLINT WATER CASES ) 5:16-cv-10444-JEL-MKM

) (consolidated)

)

) Hon. Judith E. Levy

-----) Mag. Mona K. Majzoub

HIGHLY CONFIDENTIAL

VIDEOTAPED DEPOSITION OF MARC EDWARDS, PH.D.

FRIDAY, AUGUST 7, 2020

Volume 1

Remote oral deposition of MARC EDWARDS, PH.D., conducted at the location of the witness in Blacksburg, Virginia, commencing at approximately 9:06 a.m., on the above date, before JULIANA F. ZAJICEK, a Registered Professional Reporter, Certified Shorthand Reporter, Certified Realtime Reporter and Notary Public.

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1 Q. Would you agree to if asked?

2 A. Probably not.

3 Q. All right. So I want to confirm the  
4 deposition is proceeding today on the understanding  
5 that you are here purely as a fact witness and not as  
6 a retained expert, is that correct?

7 A. Yes.

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HIGHLY CONFIDENTIAL

VIDEOTAPED DEPOSITION OF MARC EDWARDS, PH.D.

TUESDAY, AUGUST 11, 2020

Volume 3

Continued remote oral deposition of MARC EDWARDS, PH.D., conducted at the location of the witness in Blacksburg, Virginia, commencing at approximately 9:04 a.m., on the above date, before JULIANA F. ZAJICEK, a Registered Professional Reporter, Certified Shorthand Reporter, Certified Realtime Reporter and Notary Public.

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1           Q.     You are aware that there has been a  
2 massive lead service line replacement program in the  
3 City over the last number of years?

4           A.     Yes.

5           Q.     And as part of that effort information has  
6 been gathered on what the composition of -- of the  
7 pipes were?

8           A.     Yes.

9           Q.     Would you agree that -- no. Strike that.  
10                 In a number of different contexts you  
11 testified that particular information would only be  
12 known to or would only be meaningful to a handful of  
13 elite subject matter experts in corrosion.

14                 Do you -- do you recall that? And --

15           A.     Yes.

16           Q.     -- I'm not going to ask you to remember  
17 each context.

18                 Would -- would you agree that it would be  
19 unfair to hold the -- the personnel of the Flint Water  
20 Treatment Plant to the level of -- of knowledge of  
21 those elite experts?

22           A.     Absolutely.

23           Q.     Did -- in the 18 months that Flint was on  
24 the river, approximately 18 months was on the river,

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1 do you have an opinion as to whether it caused  
2 permanent damage to the plumbing of Flint homes?

3 A. Yes, I believe it did cause some level of  
4 permanent damage to Flint homes. Again, it's -- the  
5 question is how much.

6 In the grand scheme of things, I don't  
7 believe that the damage -- well, there was definitely  
8 damage. It is hard to estimate. The nature of it,  
9 the corrosion problems that I observed were mostly  
10 lead related. There was not a big problem with  
11 copper.

12 So, you get into the nitty-gritty of  
13 saying how much damage and what and that's very  
14 complicated. There is not a lot of information about  
15 it, but I do believe there was damage.

16 Q. At all homes?

17 A. Yeah, I would have to say unless they had  
18 plastic pipe or stainless steel, those materials are  
19 immune to water corrosivity essentially, yes.

20 Q. All right. Are -- are you familiar with  
21 an organization known as the Water Research Center?

22 A. I think I've heard the name. Is it in  
23 England?

24 Q. I don't know.